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Attorneys for Defendant
CRISTIAN MORA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR 12-0061-EMC-5
)	
Plaintiff,)	STIPULATION AND
)	<u>[PROPOSED]</u> ORDER FOR
v.)	RELEASE ON PREVIOUS TERMS
)	AND CONDITIONS
CRISTIAN MORA et al,)	
)	
Defendant.)	

Defendant Cristian Mora surrendered himself at the time of his plea pursuant to an agreement with the United States Attorney's Office that he do so. Since that time, his father, Jose Mora, who has been ill since 2007, has returned from seeking medical treatment in Mexico to see his son before Cristian begins an anticipated five year term. Mr. Jose Mora is very unwell and unable to visit his son in Glenn Dyer Jail, much less a federal prison.

Moreover, Cristian Mora has cooperated with the preparation of the Presentence Report. After review of the Draft Presentence Report and Bureau of Prisons Security Designation Program Statement (P5100.08), it has been determined that if

1 Cristian Mora were allowed to self-surrender he would, in all
2 likelihood, be assigned to a Low Security Level instead of a Medium
3 Security Level, which, among other benefits, would allow him many
4 more work training and educational opportunities immediately.

5 Therefore, good cause appearing, it is hereby stipulated
6 and agreed, by and between defendant Cristian Mora and the United
7 States, by and through counsel, that Mr. Mora shall be released at
8 the time of sentencing, which is scheduled to occur on July 18,
9 2012, on the same terms and conditions of his pretrial release. He
10 shall be allowed to self-surrender on a date determined by the
11 Court in the Judgment and Commitment, either to the United States
12 Marshals Service directly, or to whatever facility he is designated
13 to.

*Defendant to Surrender Aug. 29, 2012 by 12 noon.
Terms of pretrial release had to be in place.*

14
15 SO STIPULATED. *el*

16
17 July 11, 2012
Date

/s/
PAUL DELANO WOLF
Attorney for Defendant
CRISTIAN MORA

18
19 SO STIPULATED.

20
21 July 11, 2012
Date

/s/
KEVIN BARRY
Assistant United States Attorney

22
23
24 SO ORDERED.

25
26 7/18/12
Date


HONORABLE EDWARD M. CHEN
United States District Judge